

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**MOTION FOR EXTENSION OF TIME**

The United States, through the undersigned attorney, respectfully requests an extension of time for the filing of automatic discovery pursuant to Local Rules 116.1(A)-(D) and 116.2(A) & (B)(1), up to and including January 10, 2005. As grounds for this motion, the government states as follows:

1. The prosecutor initially assigned to this case, Robert Peabody, terminated his employment with the Department of Justice in late November, 2004. The undersigned prosecutor, who recently joined the U.S. Attorney's Office, was subsequently assigned this matter.

2. Court records indicate that the defendant was arraigned before Magistrate Judge Joyce London Alexander on November 15, 2004, making automatic discovery under the local rules due on or before December 13, 2004. The undersigned AUSA is scheduled to begin a trial in Dedham Superior Court as a Special Assistant Attorney General in the case of *Commonwealth v. Timothy White*, Norfolk Superior Court No. 03-0154. That trial, scheduled to

begin on January 24, 2004, is expected to last three to four weeks.

4. The additional time requested is necessary so that the undersigned AUSA will have enough time to gather all relevant and material discovery materials and to meet meaningfully with the agents in this case.

WHEREFORE, the United States respectfully requests an extension of time for the government to file automatic discovery pursuant to Local Rules 116.1(A)-(D) and 116.2(A) & (B)(1), up to and including January 10, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/William F. Bloomer  
WILLIAM F. BLOOMER  
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